

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.

Defendants.

Case No. 1:23-cv-06188-ER

**DECLARATION OF
CHANTALE FIEBIG**

CHANTALE FIEBIG, an attorney duly admitted to practice in the Southern District of New York, declares the following under penalty of perjury:

1. I am a partner at the law firm of Weil, Gotshal & Manges LLP, counsel for Defendant IQVIA Holdings Inc. I respectfully submit this Declaration in Opposition to the FTC's Motion in Limine to Exclude Certain Opinions of Dr. Anupam B. Jena.
2. Attached hereto as Exhibit 1 is a true and correct copy of DX1889, the Deposition Transcript of Dr. Kostis Hatzitaskos.
3. Attached hereto as Exhibit 2 is a true and correct copy of DX0074, the Expert Report of Dr. Kostis Hatzitaskos.
4. Attached hereto as Exhibit 3 is a true and correct copy of DX1890, the Deposition Transcript of Dr. Anupam B. Jena.
5. Attached hereto as Exhibit 4 is a true and correct copy of DX0075, the Expert Report of Dr. Anupam B. Jena.
6. Attached hereto as Exhibit 5 is a true and correct copy of DX0019, the Deposition Transcript of [REDACTED].
7. Attached hereto as Exhibit 6 is a true and correct copy of DX0854, a document produced by IQVIA bearing the Bates number IQVLIT-000792288.
8. Attached hereto as Exhibit 7 is a true and correct copy of a document produced by IQVIA bearing the Bates number IQVIA-FTC-004732582.

Dated: November 16, 2023

Respectfully submitted,

/s/ Chantale Fiebig

WEIL, GOTSHAL & MANGES LLP

Chantale Fiebig

Mark Perry (*pro hac vice*)

Andrew Tulumello (*pro hac vice*)

Mike Moiseyev (*pro hac vice*)

Joshua M. Wesneski

2001 M Street NW, Suite 600

Washington, DC 20036

Tel: (202) 682-7000

chantale.fiebig@weil.com

mark.perry@weil.com

drew.tulumello@weil.com

michael.moiseyev@weil.com

joshua.wesneski@weil.com

Robert Taylor

Lisa Pieters

767 Fifth Avenue

New York, NY 10153

robert.taylor@weil.com

lisa.pieters@weil.com

Sarah M. Sternlieb

700 Louisiana Street, Suite 1700

Houston, TX 77002

sarah.sternlieb@weil.com

Elizabeth Y. Ryan (*pro hac vice*)

200 Crescent Court, Suite 300

Dallas, TX 75201

liz.ryan@weil.com

CLEARY GOTTLIEB STEEN &
HAMILTON LLP

Kenneth Reinker

Leah Brannon

Bruce Hoffman

Clotilde Le Roy

2112 Pennsylvania Avenue, NW

Washington, DC 20037

Tel: (202) 974-1500

kreinker@cgsh.com

lbrannon@cgsh.com

bhoffman@cgsh.com
cleroy@cgsh.com

Rahul Mukhi
One Liberty Plaza
New York, NY 10006
Tel: (212) 225-2000
rmukhi@cgsh.com

Attorneys for Defendant IQVIA Holdings Inc.